

RECORD OF
COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☒ CONFERENCE

☒ OTHER (SPECIFY)

Quality Assurance Review of PEDCo's Part A Review

(Record of item checked above)

TO:

File

FROM:

La Segner

DATE

6 May 1982

TIME

9:10 a.m.

SUBJECT

Review of Part A Letter to Norplex-

SUMMARY OF COMMUNICATION

IAD 073489288, Postville, Ia

The review appears quite good, however, # three of the letter appears unnecessary and inappropriate.

Although beneficial info has been provided to the firm in the letter, the letter should be retyped w/out

3 & changed to # 7 (last #) because we should not require a new notification form based on what the review pointed out.

Please note that the info in the letter in #s 4 & 5 would not be needed; it really is only nice to know info. however let's leave in this letter.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Retype letter as noted above.



R00330128

RCRA RECORDS CENTER

INFORMATION COPIES

TO: *PEDCo*

PART A TECHNICAL REVIEW CHECKLIST

I. EPA I.D. NUMBER IAD 073489288

II. FACILITY NAME AND LOCATION NORPLEX DIVISION, UOP INC.
NORTHEAST COUNTY ROAD, POSTVILLE, IA 52162

III. APPLICATION FILE CHECKED OUT BY R. Krishnan

ON March 11, 1982

IV. TECHNICAL REVIEW INFORMATION (122.24)

| REVIEW ITEMS | OK | NOT OK | REMARKS |
|--|----|--------|---|
| 1. Administrative Items Complete | | ✓ | See No. 1 under Item 9 |
| 2. Latitude & Longitude of Facility | ✓ | | |
| 3. Name, Address and Telephone Number of Owner of Facility of Owner of Facility | ✓ | | |
| 4. New Facility <u> </u> Exist. Facility <u>✓</u> First App. <u>✓</u> Revised App. <u> </u> | ✓ | | |
| 5. Description and Design Capacity of TSD Processes | ✓ | | |
| 6. Info. on wastes listed in Part 261 to be treated, stored or disposed of at the facility. | | ✓ | See No. 2 under Item 9 |
| 7. Check design capacity against estimated annual quantity for reasonableness | | ✓ | See No. 3 under Item 9. |
| 8. Facility Drawing <u>✓</u> Map <u>✓</u> Photographs <u>✓</u> | ✓ | | Ensure that empty barrels shown in photograph are not in violation of 261.7 |

9. Additional comments (incompatible wastes, inconsistencies, etc.)

- In Form 3510-1 of the Part A RCRA application, the applicant reports that the company ^{already} has an existing RCRA permit - is this due to misunderstanding of the question.
- D000, D001 and D002 wastes are indicated on the Notification Form 8700-12, whereas only D001 & D002 are reported on Part A RCRA Permit Application, what wastes do D000 encompass?
- Comparing design capacity against estimated annual quantity, it appears that storage capacity corresponds to waste generation over

V. ADDITIONAL INFORMATION REQUIRED Yes ☒ No ☐

1. If yes, indicate information required Information indicated
on suggested letter (attached)

(Continue on separate sheet and attach)

2. Information requested on telephone by _____
on _____
(Response attached)

3. Information requested by letter (copy attached) on _____
Response received (copy attached) on _____
(If necessary attach records of additional telephone and/or mail
correspondence which clarify previous information.)

4. Review by Permits Work Unit completed on _____

VI. DISPOSITION OF PERMIT APPLICATION



1. Permit application deficient.
(Detailed Justification Attached)

a. Letter of Notice to Disqualify facility from Interim Status sent
on _____

b. Response received on _____

c. Final Determination:

i. Final Notice of Disqualification sent on _____

ii. Redetermination of Qualification - Interim Status
Eligibility Approved (See Item VI-2)



2. Permit Application Complete

a. Conditions of Operations during Interim Status
completed on _____

b. Notice of Proposed Permit Action
sent to State on _____

c. Comment Period expiration date
(10 calendar days) _____

d. Permit Acknowledgment Letter and Conditions of Operations
sent on _____

VII. CERTIFICATION OF REVIEW

The facility permit application and supporting information has been reviewed in accordance with applicable RCRA Regulations, 40 CFR Parts 260-267 and 122-124.

Permits Work Unit Reviewer

Date

Permits Work Unit Supervisor

Date

VIII. File returned to CSC on _____

Mr. A. K. Simons, Group V.P.
UOP, Inc.
Ten UOP Plaza
Des Plaines, Illinois 60016

EPA ID No. IAD073489288
Facility location: Norplex Div., UOP, Inc.
N.E. County Rd.
Postville, Iowa 52162

Dear Mr. Simons:

We are conducting a technical review of your Resource Conservation and Recovery Act (RCRA) Hazardous Waste Permit Application Part A (EPA Forms 3510-1 and 3510-3, dated October 22, 1981). In order to complete our review we are requesting clarification or action on the following.

In item X of Form 3510-1 of the permit application, you have reported that you already have an existing hazardous waste RCRA permit. This appears to be due to a misunderstanding of the information required, and needs to be deleted.

The notification Form EPA 8700-12 dated August 14, 1980 lists D000, D001, and D002 under non-listed hazardous wastes. However, the Part A RCRA permit application dated November 13, 1980, provides information on D001 and D002 only. Please clarify the wastes which are included under D000 and provide estimated quantities on Form 3510-3 of the Part A application.

The process design capacities reported for storage in your hazardous waste permit application (Form 3510-3, item III) appear to be inadequate for storing the estimated quantities of wastes listed in item IV for a period greater than 90 days. Additional storage capacity may be required if the hazardous wastes are to be stored for longer periods of time before being transported for ultimate disposal.

You are advised that storage of empty barrels (shown in one of your photographs) is subject to regulation if it does not meet the criteria listed in 40 CFR Section 261.7.

If you add new hazardous wastes not previously identified in the Part A permit application, you may treat, store, or dispose of it at your facility only if you submit a revised Part A permit application (40 CFR 122.23(c) Changes During Interim Status). When submitting a revised permit application a responsible corporate officer must sign the application. Region VII's policy is that a plant manager may sign the application if he is the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25,000,000 (in second-

quarter 1980 dollars), and if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. This policy is based upon a proposed, but not yet promulgated amendment to 40 CFR 122.6(a)(1).

I am enclosing a blank notification form and a blank Part A permit application. When submitting a revised notification form, please check the box "subsequent notification" and resubmit in their entirety each item on the notification form. When submitting a revised permit application, please resubmit in their entirety each item on the application for which changes are requested. In addition, Items I and IX (and Item X if applicable) must be completed. It is not necessary to resubmit information for other items that will not change. Please return the amended notification form and/or Part A permit application form to Mr. Steve Busch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106, within 30 days of receipt of this letter. If you have any questions please contact Mr. Busch at (816) 374-6864.

Sincerely,

U.S. ENVIRONMENTAL PROTECTION AGENCY

Lynn Harrington
Acting Chief Permits Section
Waste Management Branch

LH/vss

Enclosure

cc: R. Kolpa (IDEQ)
C. Englebert, Plant Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. A. K. Simons, Group V.P.
UOP, Inc.
Ten UOP Plaza
Des Plaines, Illinois 60016

EPA ID No. IAD073489288
Facility location: Norplex Div., UOP, Inc.
N.E. County Rd.
Postville, Iowa 52162

Dear Mr. Simons:

We are conducting a technical review of your Resource Conservation and Recovery Act (RCRA) Hazardous Waste Permit Application Part A (EPA Forms 3510-1 and 3510-3, dated October 22, 1981). In order to complete our review we are requesting clarification or action on the following.

In item X of Form 3510-1 of the permit application, you have reported that you already have an existing hazardous waste RCRA permit. This appears to be due to a misunderstanding of the information required, and needs to be deleted.

The notification Form EPA 8700-12 dated August 14, 1980 lists D000, D001, and D002 under non-listed hazardous wastes. However, the Part A RCRA permit application dated November 13, 1980, provides information on D001 and D002 only. Please clarify the wastes which are included under D000 and provide estimated quantities on Form 3510-3 of the Part A application.

The process design capacities reported for storage in your hazardous waste permit application (Form 3510-3, item III) appear to be inadequate for storing the estimated quantities of wastes listed in item IV for a period greater than 90 days. Additional storage capacity may be required if the hazardous wastes are to be stored for longer periods of time before being transported for ultimate disposal.

You are advised that storage of empty barrels (shown in one of your photographs) is subject to regulation if it does not meet the criteria listed in 40 CFR Section 261.7.

If you add new hazardous wastes not previously identified in the Part A permit application, you may treat, store, or dispose of it at your facility only if you submit a revised Part A permit application (40 CFR 122.23(c) Changes During Interim Status). When submitting a revised permit application a responsible corporate officer must sign the application. Region VII's policy is that a plant manager may sign the application if he is the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross

| CONCURRENCES | | | | | | | |
|--------------|-------|------------|-------|--|--|--|--|
| SYMBOL | PMTS | PMTS | PMTS | | | | |
| SURNAME | Busch | Harrington | Morby | | | | |
| DATE | | | | | | | |

annual sales or expenditures exceeding \$25,000,000 (in second-quarter 1980 dollars), and if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. This policy is based upon a proposed, but not yet promulgated amendment to 40 CFR 122.6(a)(1).

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Sincerely,

U.S. ENVIRONMENTAL PROTECTION AGENCY

Lynn Harrington
Acting Chief Permits Section
Waste Management Branch

LH/vss

Enclosure

cc: R. Kolpa (IDEQ)
C. Englebert, Plant Manager
bcc: PEDCo
M. Sanderson (AWCM)